

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
ANTOINISHA BERTHA WELLS,	:	Case No.: 22-10087-djb
	:	
Debtor.	:	
	:	

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

TIMOTHY ROBERTSON ("Movant") has filed a Motion pursuant to 11 U.S.C. section 362(d)(2) seeking relief from the automatic stay provisions of the United States Bankruptcy Code for an Order granting Movant permission to proceed with a state court quiet title action captioned *Timothy Robertson v. Antoinisha Wells*, in the Philadelphia County Court of Common Pleas, Docket No.: 24070490 to quiet title to the property located at 3344 Agate Street, Philadelphia, PA (the "Property") in which Antoinisha Bertha Wells' ("Debtor") interest was abandoned pursuant to the Debtor's confirmed Chapter 13 Plan of Reorganization.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

2. **If you do not want the court to grant the relief sought in the motion** or if you want the court to consider your views on the motion, then on or before **Thursday, June 19, 2025**, you or your attorney must file a **response to the motion**. (See instructions below).

3. A hearing on the motion is scheduled to be held on **June 26, 2025 at 11:00 a.m.** before **U.S. Bankruptcy Judge Derek J. Baker** in Courtroom #2, at U.S. Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing. Requests for participation other than in person must be made pursuant to Local Bankruptcy Rule 9076-1.

4. **If you do not file a response to the motion**, the court may cancel the hearing and enter an order granting the relief requested in the motion.

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney whose name and address is listed below.

Filing Instructions

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-2**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at U.S. Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107.

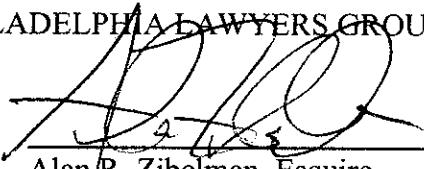
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the deadline in paragraph two.

10. On the same day that you file or mail your response to the motion, you must mail or deliver a copy of the response to the movant's attorney:

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PHILADELPHIA LAWYERS GROUP, LLC

Dated: June 5, 2025

By: 

Alan R. Zibelman, Esquire